

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

THE TRUSTEES OF PURDUE
UNIVERSITY,

Plaintiff,

v.

STMICROELECTRONICS
INTERNATIONAL N.V. and
STMICROELECTRONICS, INC,

Defendants.

CIVIL ACTION NO. 6:21-CV-00727-ADA

JURY TRIAL DEMANDED

DECLARATION OF HALIMA SHUKRI NDAI

I, Halima Shukri Ndaï, declare as follows:

1. I am an attorney at The Shore Firm and counsel of record for Plaintiff The Trustees of Purdue University (“Purdue”) in the above-captioned matter. I am over 21 years of age and am competent to make this declaration. All the statements set forth herein are true and correct and are based upon my personal knowledge.

2. On January 14, 2022, Defendants (“ST”) produced prior art materials and only datasheets for certain accused products. No process flows, GDS files, or mask information were produced since ST wanted source code protections for these materials. *See* Dkt. 64. On February 14, 2022, the Court entered the Protective Order in this case. Dkt. 65. On February 17, 2022, ST produced its first CAD files, which were related to prior art devices and not the accused products. ST only began meaningful production of relevant technical materials on July 27, 2022 (i.e., documents bates labeled ST-PURDUE_00029250-85814). *See* ST’s Supplemental Responses to Interrogatory No. 3, attached as Exhibit 3 to Reply in support of Purdue’s Motion for Leave to Add Claim 10 (“Reply”). Notably, the First Supplemental Response to Interrogatory No. 3, which includes critical correlation information and is the bedrock of Purdue’s infringement case, was

served on August 5, 2022. Thereafter, the next relevant production did not occur until August 8, 2022 (i.e., documents bates labeled ST-PURDUE_00088155-88245), and the Second Supplemental Response was not served until September 7, 2022. ST's production of technical materials was ongoing until October 13, 2022. In fact, on September 19, 2022, ST produced 2 CAD files for NI699 (die code for some of the accused produced), without which Purdue could not chart those accused products, along with process flows and mask sequences (i.e., documents bates labeled ST-PURDUE_00101858-102018). *See* Exhibit A to the Reply. In light of the various recent productions, ST served its Third Supplemental Response to Interrogatory No. 3 on October 25, 2022.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on November 14, 2022 in Dallas, Texas.

/s/ Halima Shukri Ndai
Halima Shukri Ndai